

Flores, Priscilla (Feliciano)

From: Davidj Gray <gray.davidj@epamail.epa.gov>
Sent: Wednesday, September 24, 2014 1:36 PM
To: Gray, Davidj
Subject: Fw: Deposition Subpoena - Town Boxford v. MassDOT (Salt Shed) (1 of 2)
Attachments: masshighwaydeptboxfordsaltshedcondemnedsign010809.jpg; MassHwyInfoRequest9_22_09.pdf; AF_SODIUM 2008.doc.pdf; I95boxfordmakeyto051409sampling.tif; Salt,Chloride,Cal, 2009.pdf; I95Nscavengerwelldischargecatchbasin052809.jpg; Draft 308 Ltr5_20_09_djg.doc; Boxford_info request for MassHighway DRAFT.doc; MassHighway Boxford Locus.bmp; MS4_Series_Boxford, MA.pdf; I95fishbrooklookingupstreamboxfordma060509.jpg; Dave White.doc; Draft 308 Ltr5_20_09.wpd; Draft 308 Ltr6_30_09.wpd; Draft 308 Ltr8_12_09.wpd; Draft 308 Ltr8_28_09.wpd; Microsoft_Word_-_41703_AF_SODIUM.doc.pdf; I95scavengerwelldischargelineboxfordma052809.jpg; ATTLA27Z.wpd; 3846f58-D4.pdf; ATTXDQ4G.jpg; MassHwyMap_Boxford_D4-15.pdf; Info request area map_boxford salt shed.jpg; Ma Highway 308 Extension (Oct 2 09).pdf; Dave white 2008.doc; Copy of BOXFORD-ANDREWS_FARM_SODIUM.xls

~~~~~  
David J. Gray, P.E.  
Office of Ecosystem Protection  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Ste. 100 (OEP06-1)  
Boston, MA 02109-3912

Phone: 617.918.1577

eFax: 617.918.0577

gray.davidj@epa.gov

----- Forwarded by Davidj Gray/R1/USEPA/US on 09/24/2014 01:35 PM -----

From: Davidj Gray/R1/USEPA/US  
To: Maureen McClelland/R1/USEPA/US@EPA, Lynda Boriskin/R1/USEPA/US@EPA  
Cc: David Webster/R1/USEPA/US@EPA, Thelma Murphy/R1/USEPA/US@EPA  
Date: 02/07/2013 12:11 PM  
Subject: Deposition Subpoena - Town Boxford v. MassDOT (Salt Shed) (1 of 2)

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Hi,

Appended here and in a subsequent email ("2 of 2") are my email correspondence related to the subject matter. In addition, I have a relatively thin paper file with relevant information that I can copy or share. There are also numerous MassDOT SWMPs, annual reports, and correspondence generally relating to MassDOT's MS4 Permit and its Stormwater Management Program in that contain information on MassDOT's Snow and Ice Control Program. Excerpting and reproducing this information would be time consuming as we may want to ask the requestor if providing an inventory of, and/or direct access to, this information is preferable.

Thanks,

~~~~~  
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----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Ross Povenmire <rpovenmire@town.boxford.ma.us>
To: Davidj Gray/R1/USEPA/US@EPA
Date: 03/07/2006 03:45 PM
Subject: MassHighway NPDES permit

David,

I was recently alerted to the fact that the EPA is currently considering MassHighway's application for an NPDES permit renewal. Unfortunately the public comment period has closed. I wonder if there is any other way to submit concerns at this time. In particular, the Town of Boxford has experienced severe contamination of its groundwater by MassHighway road salt storage and road salting practices. The section of I-95 in Boxford was designated a low salt zone but by MassHighway's own admission, it was not accorded low-salt treatment for years, resulting in salt-laden runoff reaching permeable soils and groundwater. Efforts by MassHighway to provide replacement wells for affected homeowners has resulted in additional impact to wetlands due to lack of erosion control, poor supervision of contractors by MassHighway, and poor construction practices by the contractors. To date, MassHighway has not obtained permits from the Conservation Commission for any of the work, and has only recently reluctantly agreed to submit to the authority of the Commission under the Wetland Protection Act. MassHighway has been very reluctant even to inform the local permitting authorities of what activities MassHighway is engaged in within the Town. In my experience, there is also a tendency within MassHighway for different departments to act independently, and for agreements made with the environmental department to be diluted or lost in the internal communication process with other departments. Specifically, an agreement by MassHighway Environmental Department to coordinate the installation of erosion control with the Conservation Office during a repaving project was not fulfilled. I had to dig through the chain of command to find the construction supervisor to achieve the desired results. In the past couple of weeks I have sent out no fewer than three enforcement orders related to MassHighway's salt remediation program. I therefore urge EPA to give MassHighway's application close scrutiny.

Ross

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Davidj Gray/R1/USEPA/US
To: rpovenmire@town.boxford.ma.us
Date: 02/03/2006 04:48 PM
Subject: Stormwater Bylaw Applicability to State Agencies

Hi Ross,

Good to hear from you again. I understand your question as: 'whether or not Boxford's pending stormwater bylaw would apply to MassHighway, and its salt storage shed in particular.' I only have a moment now, but will follow-up with a complete answer next week once I have had a chance to refer to some key notes and seek assistance from counsel...

Just as Federal agencies often don't conform to state law, it is my general understanding from case law that Federal and state agencies need not recognize local ordinances and bylaws; with some exceptions for safety and reasonable accommodation. However, just as MHD needs to comply with the MA Wetlands Protection Act as administered at the local level, they would also need to comply with a bylaw that is adopted under authority granted by state law (i.e. M.G.L. c.83 s.10: Sewers, Drains, and Sidewalks - Rules and regulations regarding use and connections) or the Clean Water Act, and in fulfillment of its implementing regulations. An analogous program would be EPA's industrial pretreatment program (a.k.a. "local limits"), which is administered at the local level by the municipality/POTW.

An other point to consider is whether or not stormwater from the salt shed facility discharges into the town's MS4, or directly into Waters of the Commonwealth or U.S. If the latter, I don't think you could rely on authority granted under the Clean Water Act. The Phase II Rule, Regulations, and Small MS4 Permit only address discharges to your MS4, not direct discharges into state and U.S. Waters. You may want to check your "Authority" section.

Regards,

~~~~~  
David J. Gray, P.E.  
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U.S. Environmental Protection Agency  
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eFax: 617.918.0577

gray.davidj@epa.gov

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From: Ross Povenmire <rpovenmire@town.boxford.ma.us>  
To: Davidj Gray/R1/USEPA/US@EPA  
Date: 02/06/2006 01:57 PM  
Subject: RE: Stormwater Bylaw Applicability to State Agencies

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Thanks, David, you and I are thinking alike. I will be interested to know if you find out anything more. I suspect MassHighway has an individual discharge permit for its operations that allows it to discharge notwithstanding local requirements.

Ross

-----Original Message-----

From: gray.davidj@epamail.epa.gov [<mailto:gray.davidj@epamail.epa.gov>]  
Sent: Friday, February 03, 2006 4:48 PM  
To: Ross Povenmire  
Subject: Stormwater Bylaw Applicability to State Agencies

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----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Davidj Gray/R1/USEPA/US
To: Karen Mcguire/R1/USEPA/US@EPA
Date: 12/23/2008 02:00 PM
Subject: Boxford - Salt Pile

Hi Karen,

This 3/7/06 email and the appended email from 2/3/06 are the only substantive email I could find on the subject. I'll keep looking in my paper files.

djg

----- Forwarded by Davidj Gray/R1/USEPA/US on 12/23/2008 01:53 PM -----

Ross Povenmire
<rpovenmire@town.boxford.ma.us>

03/07/2006 03:43 PM

To Davidj Gray/R1/USEPA/US@EPA

cc

Subject MassHighway NPDES permit

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tendency within MassHighway for different departments to act independently, and for agreements made with the environmental department to be diluted or lost in the internal communication process with other departments. Specifically, an agreement by MassHighway Environmental Department to coordinate the installation of erosion control with the Conservation Office during a repaving project was not fulfilled. I had to dig through the chain of command to find the construction supervisor to achieve the desired results. In the past couple of weeks I have sent out no fewer than three enforcement orders related to MassHighway's salt remediation program. I therefore urge EPA to give MassHighway's application close scrutiny.

Ross

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Davidj Gray/R1/USEPA/US

02/03/2006 04:48 PM

To rpoventmire@town.boxford.ma.us

cc

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----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Davidj Gray/R1/USEPA/US  
To: Karen McGuire/R1/USEPA/US@EPA  
Date: 01/13/2009 08:53 AM  
Subject: MassHighway Facility - Topsfield Road, Boxford, MA

---

Hi Karen,

Attached is a map and imbedded is a profile of the subject MassHighway facility in Boxford. MassHighway provided this information (c. 2002 - 2003) for its facilities in 2006 to EPA. Click [here](#) to view an orthophoto of the site. Also, I have included excerpts from MassHighway's SWMP and EMS regarding the Facility Handbooks it created for each of its facilities several years back. I could request the handbook for the Boxford site from Henry if we deem necessary.

*(See attached file: 3846f58-D4.pdf)*

# MassHighway Facility Profile

|                                          |                   |
|------------------------------------------|-------------------|
| <b>District Number</b>                   | 4                 |
| <b>Facility Number</b>                   | 58                |
| <b>Facility Name</b>                     | Boxford           |
| <b>Facility Address</b>                  | Topsfield Road    |
| <b>Facility Phone Number</b>             | (978) 887-5362    |
| <b>District HazMat Coordinator Name</b>  | Ken Leach         |
| <b>Phone Number</b>                      | 781-641-8473      |
| <b>Pager Number</b>                      |                   |
| <b>Operations Engineer Name</b>          | Dave Rock         |
| <b>Phone Number</b>                      | 617-973-8822      |
| <b>Pager Number</b>                      | 781-495-7851      |
| <b>Phone (other)</b>                     | 617-592-8802      |
| <b>Safety Officer Name</b>               | Ted Doyle         |
| <b>Phone Number</b>                      | 978-287-6120      |
| <b>Pager Number</b>                      | 781-495-7668      |
| <b>Phone (other)</b>                     | 508-641-0348 Cell |
| <b>Asbestos Coordinator Name</b>         | Ann Roche         |
| <b>Phone Number</b>                      | 781-641-8321      |
| <b>Pager Number</b>                      |                   |
| <b>Phone (other)</b>                     |                   |
| <b>Activity and Use Limitation (AUL)</b> | No                |
| <b>EPA ID #</b>                          | MAV000005442      |
| <b>Hazardous Waste Status</b>            | VSQG              |
| <b>Waste Oil Status</b>                  | VSQG              |
| <b>Sanitary Discharge</b>                | Septic            |



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From MassHighway's 2006 SWMP:

B. Maintenance/ Material Storage Yards (BMP 6C-2) – MassHighway has recently completed a review of each of its 139-maintenance/ material storage yards. A Facility Handbook was created for each facility and provides the information needed to maintain environmental compliance at the maintenance facilities in accordance with MassHighway's Environmental Management System (EMS). The handbook is used as a reference guide and contains useful information such as Standard Operating Procedures (SOPs) and environmental policies. The review also included development of facility layout plans.

~~~

Excerpt from MassHighway's EMS

### Facility Environmental Handbook and Facility Maps



This EMS Component provides a description of the roles and responsibilities for carrying out the process of making revisions to the Facility Environmental Handbook and Facility Maps. Facility Environmental Handbooks are readily available reference tools located at all District Headquarters, maintenance facilities, Highway Operations and Environmental to support MassHighway's EMS. Two versions of the handbook are available. Both versions contain descriptive text on regulatory programs, copies of the Environmental SOPs and the Emergency Response Spill Plan. The generic version, primarily for use in Boston and the District Headquarters, contains a list of facilities with general information. The specific version resides at each of the facilities and contains a facility profile specific to that facility only. Additionally, Facility Maps detailing existing environmental and operating conditions at these facilities are available separately and are included in the handbook. These maps detail environmental information including, but not limited to, solid waste collection areas, wetlands and buffer zones, hazardous materials storage areas, utilities related to water quality, above ground and under ground storage tank locations and associated piping and pumps, and storage sheds for sand and salt storage.

Annual review and updates to the Facility Environmental Handbook and Facility Maps ensure the text and information reflect any regulatory, operational, or administrative changes. Environmental assumes the lead in the update and distribution of the Facility Environmental Handbooks and Facility Maps. MassHighway relies on these reference materials for its annual



## Environmental Awareness Training.

### Procedure

The Supervisor of the HazMat/HazWaste Unit directs members of the Environmental Section staff to review the Facility Environmental Handbook and recommend needed changes to the descriptive text, addition or removal of SOPs, and updates to the Emergency Response Spill Plan. Upon receipt of these recommendations, the Supervisor of HazMat/HazWaste Unit directs staff to revise the handbook text. The Supervisor of HazMat/HazWaste Unit provides the revised handbook text SOPs and maps to the DHCs and other Environmental staff for review and comment within a designated comment period.

During the annual self-audits and/or regular inspection of MassHighway facilities, DHCs ensure the Facility Maps reflect current operating conditions at the facilities. DHCs will indicate any changes to operating conditions (establishment of new solid waste collection areas, new hazardous waste collection areas, presence of additional spill kits, etc.) on the Facility Maps during their audits/inspections and submit the changes to the Supervisor of the HazMat/HazWaste Unit. MassHighway CADD staff or a consultant may be used to make the necessary changes to the Facility Maps.

The Supervisor of the HazMat/HazWaste Unit collects and reviews the revisions made to the Facility Environmental Handbook and Facility Maps before submitting them to the Deputy Chief Engineer Environmental for review and comment. The Deputy Chief Engineer Environmental reviews and approves the revisions to the handbook and maps prior to issuing the updated handbook and maps to MassHighway facilities. Additionally, the Supervisor of the HazMat/HazWaste Unit provides an electronic version of the updated Facility Environmental Handbook and Facility Maps to Information Technology Services for posting onto the MassHighway Intranet. A graphic illustration of the schedule for the review cycle is provided below. This review cycle is used as the primary method for ensuring that the handbook, SOPs and maps are updated as needed prior to conducting the Annual Environmental Awareness Training in the fall.

### Annual Handbook Review and Implementation Cycle



### Roles and Responsibilities

A summary of roles and responsibilities for the Facility Environmental Handbook and Facility Maps review and revision process is provided below.

### Facility Handbook and Facility Map Review and Revision Roles and Responsibilities

| Role                                | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITS                                 | Responsible for posting the Facility Environmental Handbook and Facility Maps onto the MassHighway intranet.                                                                                                                                                                                                                                                                                                    |
| Deputy Chief Engineer Environmental | Maintains ultimate responsibility for the review and revision of the Facility Handbook And Facility Maps.                                                                                                                                                                                                                                                                                                       |
| Supervisor of HazMat/HazWaste Unit  | Coordinates and directs Facility Environmental Handbook and Facility Maps review and update. Ensures latest revision is distributed to Facilities, Districts, and Divisions.                                                                                                                                                                                                                                    |
| District HazMat Coordinators        | Provide comment on revisions to the Handbook. Responsible for updating information for Facility Profiles and distributing revised handbook pages to the facilities. Responsible for updating the Facility Maps to reflect any infrastructure changes that have occurred in the facility. Ensure, through regular inspections, that the most recent versions of the Facility Maps are available at the facility. |

Environmental  
Section Staff

Responsible for providing comments on  
revisions to Facility Environmental  
Handbook.

~~~~~  
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----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Doug Heath/R1/USEPA/US
To: Karen Mcguire/R1/USEPA/US@EPA
Cc: Davidj Gray/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA
Date: 01/29/2009 02:49 PM
Subject: Re: boxford

Hi Karen,
I'm available Tuesday through Friday next week. Have you spoken with Ross Povenmire about the situation? I asked him to contact you some weeks back because of the Town's suit against Mass Highways. Also, I drove past the state salt shed on my way to NH last month and took the attached photo. There is an interesting sign posted out front. No love lost there in Boxford.
Doug

(See attached file: masshighwaydeptboxfordsaltshedcondemnedsign010809.jpg)

▼ Karen Mcguire/R1/USEPA/US

Karen Mcguire/R1/USEPA/US

01/29/2009 01:50 PM

To: Marcel Belaval/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA,
Doug Heath/R1/USEPA/US@EPA

cc

Subject: boxford

All --

I'm trying to set up a call with the Con Com Director of Boxford to discuss concerns he raised in conversations with Doug and me regarding a salt shed. Could you let me know your availability next week other than Monday?

Thanks.

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Karen Mcguire/R1/USEPA/US
To: Doug Heath/R1/USEPA/US@EPA


THanks for sharing the photo, Doug. Ross did call me. I also got some advice from LeeAnn and wanted to bring Dave and Marcel into the loop, since they have experience with snow & ice requirements under MassHighway's MS4 permit. We should get together internally in advance of the call.

Karen

▼ Doug Heath/R1/USEPA/US

Doug Heath/R1/USEPA/US

01/29/2009 02:49 PM

To: Karen Mcguire/R1/USEPA/US@EPA
cc: Davidj Gray/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA
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[attachment "masshighwaydeptboxfordsaltshedcondemnedsign010809.jpg" deleted by Karen Mcguire/R1/USEPA/US]

▼ Karen Mcguire/R1/USEPA/US

Karen Mcguire/R1/USEPA/US

01/29/2009 01:50 PM

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MassHighway Facility Profile

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Asbestos Coordinator Name	Ann Roche
Phone Number	781-641-8321
Pager Number	
Phone (other)	

Activity and Use Limitation (AUL)	No
EPA ID #	MAV000005442
Hazardous Waste Status	VSQG
Waste Oil Status	VSQG
Sanitary Discharge	Septic

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Annual Handbook Review and Implementation Cycle



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Supervisor of HazMat/HazWaste Unit	Coordinates and directs Facility Environmental Handbook and Facility Maps review and update. Ensures latest revision is distributed to Facilities, Districts, and Divisions.
District HazMat Coordinators	Provide comment on revisions to the Handbook. Responsible for updating information for Facility Profiles and distributing revised handbook pages to the facilities. Responsible for updating the Facility Maps to reflect any infrastructure changes that have occurred in the facility. Ensure, through regular inspections, that the most recent versions of the Facility Maps are available at the facility.

Environmental Section Staff	Responsible for providing comments on revisions to Facility Environmental Handbook.
--------------------------------	---

~~~~~  
David J. Gray, P.E.  
Office of Ecosystem Protection  
U.S. Environmental Protection Agency  
1 Congress Street, Suite 1100 (CIP)  
Boston, MA 02114-2023

Phone: 617.918.1577

eFax: 617.918.0577

gray.davidj@epa.gov

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: "Ross Povenmire" <rpovenmire@town.boxford.ma.us>  
To: <maguire.karen@epa.gov>, Davidj Gray/R1/USEPA/US@EPA  
Date: 02/24/2009 01:38 PM  
Subject: Thank you for your assistance

---

Hello Karen, David,

It was a pleasure to speak with you both on the phone the other day, along with Doug Heath and Kevin Riley. The information you offered has stimulated the Town of Boxford to undertake a resistivity survey of the area around the MassHighway salt shed on Topsfield Road. Thank you again for making yourselves available for that helpful discussion.

Ross

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Neil Handler/R1/USEPA/US  
To: Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA  
Date: 05/06/2009 04:01 PM  
Subject: Boxford Salt Storage Facility Meeting

---

Doug and I met this morning to talk about Boxford and one of the things on my to do list was to send out an email to all of you to set up a meeting to discuss what we do next. Im not sure what days people might be available next week so let me suggest a couple of days : tues (5/12), wed (5/13) and thurs (5/14) and go from there. Im open for the time except wednesday after 2:00.

thanks!

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Neil Handler/R1/USEPA/US  
To: Davidj Gray/R1/USEPA/US@EPA, Jane Downing/R1/USEPA/US@EPA, Maureen McClelland/R1/USEPA/US@EPA, Denny Dart/R1/USEPA/US@EPA, Carol Kilbride/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA  
Date: 05/06/2009 04:03 PM  
Subject: Fw: 'A Civil Action' lawyer aids Boxford residents affected by salt

---

FYI!

----- Forwarded by Neil Handler/R1/USEPA/US on 05/06/2009 04:01 PM -----

Doug Heath/R1/USEPA/US

05/06/2009 03:20 PM

To

Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA

cc

Subject

'A Civil Action' lawyer aids Boxford residents affected by salt

FYI -- The Boxford salt case is going upscale...

Doug

[News](#) 

### **'A Civil Action' lawyer aids Boxford residents affected by salt**

By Brendan Lewis/blewis@cnc.com

Wed May 06, 2009, 11:44 AM EDT

T

Boxford -

A group of Boxford residents are taking it upon themselves to fight those who they say contaminated their private wells with salt. But they are not alone as notable lawyer Jan Schlichtmann, who was depicted in the movie "A Civil Action," has agreed to help the small group gain momentum in this fight.

The group of about 30, called the Boxford Watershed Association, formed after six or seven people got together in a Boxford home last month to talk about their dire situations with salt contamination. Many of their homes are impossible to sell they say because of the contamination brought on by a state-run salt shed on Topsfield Road.

Local attorney Michael McArdle had offered to see if Schlichtmann, a Beverly attorney, could help their cause. Schlichtmann gained national recognition as a result of his case against two companies alleged to have contaminated the drinking water supply in Woburn, later being depicted by John Travolta in the motion picture "A Civil Action."

"We called him and, low and behold, he was interested," said Joseph Pugia, the chairman of the Boxford Watershed Association's Steering Committee.

Over the course of 15 years, a Topsfield Road salt shed in Boxford, run by MassHighway, has polluted the private wells of more than 30 Boxford residents, according to town officials. In, December, the town of Boxford and the Board of Health condemned the salt shed and has taken both MassHighway to court as well as the Department of Environmental Protection.

While a Lawrence Superior Court judge has shuttered the salt shed while the trial proceeds, the group wants more than just to get rid of the shed.

They are now following a three-part goal: cleaning up the salt imbedded on the shed premises, limiting the salting along the Boxford corridor of Interstate 95, and beginning the discussion about their loss in property values.

"We're just fed up. We're tired of it," said Karin Rando, a Titus Land resident and member of the group whose well is contaminated with salt.

Rando said the state had been trying to deal with residents on an individual basis, but it has not worked. She said the town's help is definitely positive, but added that there needs to be more payback to address the issue that has made life hard for many Boxford residents.

"The stress of this nightmare is unbelievable," Rando said.

Most recently, the group held a meeting at the East Boxford Congregational Church, at which Schlichtmann spoke before the group.

"He's informed us that no one can help us but him and us," said Pugia.

A call to Schlichtmann's answering service was not returned as of deadline.

The most immediate goal of the group is to test the well water in as many Boxford homes as possible in order to gain broader view of the problem. The group is willing to pick up and drop off water samples and results, which the Northeast Environmental Laboratory in Danvers is offering for only \$40 per test.

The association's next meeting is scheduled for June 2 at 7:30 p.m. at the Boxford Community Center.

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Davidj Gray/R1/USEPA/US  
To: Neil Handler/R1/USEPA/US@EPA  
Date: 05/06/2009 04:57 PM  
Subject: Re: Boxford Salt Storage Facility Meeting

---

Hi Neil,

I'm free on 5/12 (except 12NN-3PM) and 5/13 (except 10AM-12NN). 5/14 is no good.

djg

▼ Neil Handler/R1/USEPA/US

**Neil Handler/R1/USEPA/US**

05/06/2009 04:01 PM

To Karen Mcguire/R1/USEPA/US@EPA, Neil  
Handler/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA,  
Kathleen Woodward/R1/USEPA/US@EPA, Davidj  
Gray/R1/USEPA/US@EPA

cc

Subject Boxford Salt Storage Facility Meeting

Doug and I met this morning to talk about Boxford and one of the things on my to do list was to send out an email to all of you to set up a meeting to discuss what we do next. Im not sure what days people might be available next week so let me suggest a couple of days : tues (5/12), wed (5/13) and thurs (5/14) and go from there. Im open for the time except wednesday after 2:00.

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From: Marcel Belaval/R1/USEPA/US  
To: Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA  
Cc: Doug Heath/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA  
Date: 05/12/2009 02:54 PM  
Subject: info request for masshighway - Boxford

---

Hi Karen and Neil.

Attached are the bullets Doug and I came up with for an info request.

-Marcel

(See attached file: Info request area map\_boxford salt shed.jpg)(See attached file: Boxford\_info request for

From: Doug Heath/R1/USEPA/US

To: Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Date: 05/12/2009 03:55 PM

Subject: I-95 MassHighway Low Salt Policy for Boxford Area

**Salt Application Practice (typical for most designated low-salt areas in Mass):**

Salt:Sand (1:1) at 240 lbs/lane-mile

Pre-Wet with liquid Magnesium Chloride at 1 gallon/lane-mile

Pre-Treat with Liquid Magnesium Chloride at 30 gallons/lane-mile

**Map at:**

[http://www.mhd.state.ma.us/downloads/snowice/saltpolicy/D4/8x11\\_D4-15.pdf](http://www.mhd.state.ma.us/downloads/snowice/saltpolicy/D4/8x11_D4-15.pdf)

Also, it looks like **I-95 in Boxford dates back to 1953, not 1974**. So salt applications are likely to have occurred over **56 years**.

|                 |                                                                                                                           |
|-----------------|---------------------------------------------------------------------------------------------------------------------------|
| Location:       | Boxford, Georgetown                                                                                                       |
| Boundary:       | Interstate I-95 From the Danvers/Middleton town line to the ]<br>Georgetown town line including all related ramp systems. |
| Length of Area: | 5.75 linear miles                                                                                                         |
|                 | 45.6 lane miles                                                                                                           |

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:18 AM -----

From: Jeff Kopf/R1/USEPA/US

To: Doug Heath/R1/USEPA/US@EPA

Cc: Davidj Gray/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA

Date: 05/13/2009 08:36 AM

Subject: Re: I-95 MassHighway Low Salt Policy for Boxford Area

So you're saying the Boxford area already is designated at a Low-Salt area?

Jeff Kopf, Senior Enforcement Counsel

US EPA Region 1

1 Congress St.

Suite 1100 (SEL)

Boston, MA 02114-2023

Tel: (617) 918-1796

Fax: (617) 918-0796

kopf.jeff@epa.gov

▼ Doug Heath/R1/USEPA/US

Doug Heath/R1/USEPA/US

05/12/2009 03:55 PM

To Karen McGuire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

cc

Subject I-95 MassHighway Low Salt Policy for Boxford Area

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Date: 05/13/2009 10:03 AM

Subject: Boxford

Hello,

Attached (in two parts) is MassHighway's SWMP (Revision 4, 1/11/08). See Part 2.6 Source Control beginning on Page 2-21 for a discussion of snow & ice control topics that reflect enhancements we required through our letters dated 8/18/06 and 10/10/2006. I have also attached MassHighway's matrix that summarizes its response to our letters.

Neil - with respect to your unanswered question from yesterday, MassHighway Water Quality SOPs are included in the Facility Environmental Handbook maintained at each facility. A generic handbook is posted at: [http://www.mhd.state.ma.us/downloads/projDev/facility\\_environmental\\_handbook/feh\\_right.htm](http://www.mhd.state.ma.us/downloads/projDev/facility_environmental_handbook/feh_right.htm) and provides links to



SOPs, including its (brief) [Handling and Storage of Sand and Deicing Chemicals SOP \(ENV-01-08-1-000\)](#).

I have also attached is MassDEP's letter to MEPA commenting on MassHighway's Snow & Ice Control GEIR, that includes a typical letter that MassHighway sent to public water suppliers in the summer of 2006 regarding the continued maintenance of its reduced salt zone(s) tributary to water supplies. Sorry I forgot about the designated reduced salt area along this stretch of I-95; but more importantly, Ross has noted that MassHighway has admitted that it has not adhered to its designated salt reduction along this alignment for years.

n.b. Here is a [news article on the topic](#) from the Salem News last summer that has some interesting pieces of information.

djg

▼ Doug Heath/R1/USEPA/US

Doug Heath/R1/USEPA/US

05/12/2009 03:55 PM

To Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

cc

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**Map at:**

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=====

File MassHighway SWMP rev04 1\_11\_08 (1of2).pdf was moved to Z:\MassHighway SWMP rev04 1\_11\_08 (1of2).pdf on 11/14/2012

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File MassHighway SWMP rev04 1\_11\_08 (2of2).pdf was moved to Z:\MassHighway SWMP rev04 1\_11\_08 (2of2).pdf on 11/14/2012

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File MHD 1-11-08 SWMP Response Matrix.pdf was moved to Z:\MHD 1-11-08 SWMP Response Matrix.pdf on 11/14/2012

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File DEP Snow and Ice GEIR MEPA Comment Ltr 10\_11\_06.pdf was moved to Z:\DEP Snow and Ice GEIR MEPA Comment Ltr 10\_11\_06.pdf on 11/14/2012

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Doug Heath/R1/USEPA/US  
To: Karen Mcguire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA  
Date: 05/20/2009 03:31 PM  
Subject: 5/14/09 Field Measurements in Silver Brook and Fish Brook in Boxford, MA

---

*(See attached file: I95boxfordmakeyto051409sampling.tif)*

FYI --

On Thursday, May 14th I had an opportunity to make synoptic measurements of temperature, specific conductivity, total dissolved solids, salinity and chloride in Silver Brook, a stream that drains I-95 Exit 52 in Boxford, Massachusetts and flows south next to a public water supply well and into Fish Brook. On that date, chloride concentrations were as much as 1.6 times above the EPA chronic standard of 230 mg/l in Silver Brook downstream of Exit 52. This concentration is approximately equivalent to a specific conductivity (SC) of 853 uS/cm (Granato and Smith, 1999). Silver Brook may also affect water quality in the CWS bedrock well of the Andrews Farm Water Company serving 145 residents. Measured with a tape, the well is only 55 feet west of the brook.

Field measurements follow below from north to south in the direction of flow. Also, a map showing sample locations numbered 1 through 8 is attached above. Use "View" to open the .tif map file.

On this date, the stream's specific conductivity was highest immediately downstream of Exit 52. It increased from 1106 to 1373 uS/cm passing under I-95. After that, possibly due to dilution from groundwater baseflow and distance from Exit 52, conductivity gradually decreased in a downstream direction. Temperature also decreased steadily in Silver Brook from 15.62 C to 12.46 C as the brook flowed south towards Fish Brook.

1. Silver Brook at I-95S (just west of south-bound ramp to Topsfield Road and upstream of the MassHighway Salt Shed):

Time = 1530  
Temp = 15.62 C  
SC = 657 uS/cm  
TDS = 0.427 g/L  
Sal = 0.32 ppt

2. Silver Brook at culvert under I-95S (and downstream of the Masshighway Salt Shed):

Time = 1520  
Temp = 14.39 C  
SC = 1106 uS/cm  
TDS = 0.718 g/L  
Sal = 0.58 ppt

3. Tributary to Silver Brook immediately upstream of Topsfield Road (E of Exit 52)

Time = 1510

Temp = 14.34 C

SC = 319 uS/cm

TDS = 0.207 g/L

Sal = 0.15 ppt

4. Silver Brook at Silver Brook Road (first crossing SE of I-95 Exit 52):

Channel: coarse sand, gravel and cobbles

Time = 1428

Temp = 13.53 C

SC = 1373 uS/cm

TDS = 0.892 g/L

Sal = 0.69 ppt

Chloride = 374 mg/l (measured by Hach Quantab titrator)

5. Silver Brook at Silver Brook Road (second crossing downstream of location above):

Channel : coarse sand, gravel and cobbles

Time = 1458

Temp = 13.08 C

SC = 1293 uS/cm

TDS = 0.841 g/L

Sal = 0.65 ppt

6. Tributary to Silver Brook at Silver Brook Road ( this small stream flows from NE to SW into Silver Brook about 200 feet upstream of the AFWC water supply well. It serves to somewhat dilute the SC level in Silver Brook):

Time = 1440

Temp = 12.86 C

SC = 345 uS/cm

TDS = 0.222 g/L

Sal = 0.16 ppt

7. Silver Brook at location 55 feet east of AFWC well:

Channel: coarse sand and gravel

Time = 1412

Temp = 12.46 C

SC = 964 uS/cm

TDS = 0.627 g/L

Sal = 0.48 ppt

8. Fish Brook at Lockwood Lane (upstream of Silver Brook confluence):

Time = 1447

Temp = 13.79 C

SC = 471 uS/cm

TDS = 0.306 g/L

Sal = 0.23

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

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To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Date: 05/22/2009 10:27 AM

Subject: Draft Boxford 308 Letter

---

I've taken a stab at putting together what I believe are most of the appropriate questions we want to ask the Massachusetts Highway Department about the Boxford Salt Storage Facility as well as the Boxford Reduced Salt Area - but obviously would welcome your thoughts about any additional questions or changes that you think are appropriate. There are a couple of areas in the 308 where I had some specific questions for Kathleen and David (you'll see it called out in bold). I'm also attaching a copy of the map which the Mass Highway Dept prepared of the Boxford Reduced Salt Area below - I thought that this map might be the easiest document to use to request information about - but please take a look and see what you think (I'll also attach a copy of the map which Marcel and Doug prepared).

Thanks,

Neil

*(See attached file: Info request area map\_boxford salt shed.jpg)(See attached file: MassHwyMap\_Boxford\_D4-15.pdf)(See attached file: Draft 308 Ltr5\_20\_09.wpd)*

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Doug Heath/R1/USEPA/US

To: Neil Handler/R1/USEPA/US@EPA

Cc: Marcel Belaval/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA

Date: 05/22/2009 11:32 AM

Subject: Re: I-95 MassHighway Low Salt Policy for Boxford Area

---

Hi Neil,

Thanks for doing a great job on the 308 letter. I have two comments:

1. Please refer to the low-salt application area as D4-15 in your request item #1 and later references. The low salt policy is described (and the map provided on page 11 of 16) at:

[http://www.mhd.state.ma.us/downloads/snowIce/saltpolicy/salt\\_policy.pdf](http://www.mhd.state.ma.us/downloads/snowIce/saltpolicy/salt_policy.pdf)

2. Ask MHD to provide a map showing which roads (besides I-95) in this D4-15 area are treated by MHD. This will provide us a better idea of what roads they are responsible for, especially in the Exit 52 area. The rest presumably are town treated. For example, does MHD treat Topsfield Road? If so, how much of it? What other local roads are treated by their operation?

The rest of the information request looks fine to me.

FYI - Here are links to other parts of the MHD snow and ice website that might interest you. Just type in Boxford in the town query box. The first one refers to a 2003 project bid of \$10,000 entitled:

|                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>BOXFORD- POSTED PROPOSAL TO COVER THE COST OF REPLACING A WELL AND WATERLINE CONNECTION ON PRIVATE PROPERTY ON SILVERBROOK ROAD</b> |
|----------------------------------------------------------------------------------------------------------------------------------------|

It would be great to know if this project (or others) were completed) and what were the results. It cites Henry Barbaro as a contact. There is also a \$900,000 project listed to replace the salt shed.

Doug

LINKS:

Boxford private residence 2003 water-replacement project bid offer:

<http://www.mhd.state.ma.us/default.asp?pgid=content/projectsRoot&sid=wrapper&iid=http://www.mhd.state.ma.us//ProjectInfo/>

Salt Remediation program brochure:

[http://www.mhd.state.ma.us/downloads/environ/PamphletV2\\_1-29-07.pdf](http://www.mhd.state.ma.us/downloads/environ/PamphletV2_1-29-07.pdf)

Salt Remediation Program:

[http://www.mhd.state.ma.us/default.asp?pgid=content/environ/salt\\_rem&sid=about](http://www.mhd.state.ma.us/default.asp?pgid=content/environ/salt_rem&sid=about)

PWS Data Form (for supplies having 20 mg/l of sodium or 250 mg/l chloride or more):

<http://www.mhd.state.ma.us/downloads//environ/MHD-ES-PWSD-113.pdf>

Private Well Data Form:

<http://www.mhd.state.ma.us/downloads/environ/MHD-ES-PWD-112.pdf>

Road Treatment Materials:

<http://www.mhd.state.ma.us/default.asp?pgid=snowandice/roadTreatment&sid=about#materials>

▼ Neil Handler/R1/USEPA/US

Neil Handler/R1/USEPA/US

05/22/2009 10:18 AM

To Doug Heath/R1/USEPA/US@EPA

cc

Subject Re: I-95 MassHighway Low Salt Policy for Boxford Area 

Doug,

Was wondering how/where you found the link below to the map showing the Boxford Reduced salt Area - I could not seem to find any link to maps or reduced salt area on the Mass Highway Snow Ice portion of their website?

Thanks,

Neil

▼ Doug Heath/R1/USEPA/US

Doug Heath/R1/USEPA/US

05/12/2009 03:55 PM

To Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

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Date: 05/22/2009 12:48 PM  
Subject: Fw: Sodium test May 2009

Here is some sampling info which Doug Conn (President of Andrews Farm Water Company) provided. Mr. Conn is also planning to provide a copy of a GZA hydrogeological report (once he can scan it) which was prepared in the early 90's as part of the permit process to get Andrews Farm licensed as a community water system. Mr. Conn said that in general the sodium levels detected in their well have been decreasing over time with the exception of the increase noted around 2005 - Mr. Conn thought that the increase (and decrease) coincided with the pumping period by Mass Highway for the scavenger well located just North of Andrews Farm. Was wondering if we have any other sampling info for other PWS using gw but not situated so close to a highway to compare the levels to?

----- Forwarded by Neil Handler/R1/USEPA/US on 05/22/2009 12:36 PM -----

"AFWC" <afwcboxford@aol.com>

05/22/2009 11:26 AM

To Neil Handler/R1/USEPA/US@EPA

cc

Subject Sodium test May 2009

Neil

**Please find the test results for May 2009 and the excel sheet from Mass DEP**

**I'll take a walk to see if the two brooks connect? or not**

**Doug** (See attached file: AF\_SODIUM 2008.doc.pdf)(See attached file: Salt,Chloride,Cal, 2009.pdf)(See attached file: Copy of BOXFORD-ANDREWS\_FARM\_SODIUM.xls)  
----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US  
To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA  
Date: 05/22/2009 12:54 PM  
Subject: Fw: Sodium Contamination at Andrews Farm Water co. well

---

FYI!

----- Forwarded by Neil Handler/R1/USEPA/US on 05/22/2009 12:53 PM -----

"AFWC" <afwcboxford@aol.com>

05/22/2009 11:23 AM

To Neil Handler/R1/USEPA/US@EPA

cc

Subject FW: Sodium Contamination at Andrews Farm Water co. well

Neil this is a copy of a complaint I sent to state reps and mass hwy plus BOH in Boxford

I'll send another email with more info

Great to speak with you today

Doug

-----Original Message-----

**From:** afwcboxford@aol.com [<mailto:afwcboxford@aol.com>]

**Sent:** Monday, September 22, 2008 4:38 PM

**To:** klongo@town.boxford.ma.us; Rep.BradHill@hou.state.ma.us; Bruce.Tarr@state.ma.us; mfavaloro@favlaw.com; alexander.constan@ipi.com; BPSTANLEY@comcast.net; mitschm@wseinc.com; Louise.Kress@comcast.net; TCAdtaylor@cs.com; abenson@town.boxford.ma.us

**Subject:** Sodium Contamination at Andrews Farm Water co. well

After the recent newspaper articles we again tested our well water for sodium. I received the results today and see we have had a 10 percent plus increase in sodium over the past 4 years. Whatever Mass Highway is doing "It isn't working". Our sodium levels were constantly dropping for many years. Our 2004 test result was 58 mg/l. now it's 64 mg/l. A copy of the report is attached. The (what I call ) Connery unpermitted cut off well may very well have pumped more



contaminated water closer to our source and increased the contamination.

We supply water to over 140 residents of Boxford.

I need Mass Hwy or the Town of Boxford to respond to this increase in contamination and what they plan to do to eliminate this problem.

Very truly yours  
Doug Conn  
President  
Andrews Farm Water Co. Inc.

cc Mark Favaloro

---

Find phone numbers fast with the [New AOL Yellow Pages!](#) (*See attached file: Microsoft\_Word\_-\_41703\_AF\_SODIUM.doc.pdf*)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US

To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Date: 05/22/2009 01:21 PM

Subject: Fw: letter or form to Dave White Mass Hwy

---

More info....regarding Andrews Farm Water Company.

----- Forwarded by Neil Handler/R1/USEPA/US on 05/22/2009 01:16 PM -----

"Doug Conn" <drconn@comcast.net>

05/22/2009 11:31 AM

To

Neil Handler/R1/USEPA/US@EPA

cc

Subject

letter or form to Dave White Mass Hwy

**Neil**

**More info**

**Doug** (*See attached file: Dave white 2008.doc*)(*See attached file: Dave White.doc*)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Davidj Gray/R1/USEPA/US

To: Neil Handler/R1/USEPA/US@EPA

Cc: Kathleen Woodward/R1/USEPA/US@EPA

Date: 05/28/2009 04:11 PM

Subject: Re: Draft Boxford 308 Letter

---

Hi Neil,

Got your message. I think your letter looks good. I addressed your questions to me and Kathleen in the attached mark-up.

~~~~~  
David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100 (CIP)
Boston, MA 02114-2023

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

-----Neil Handler/R1/USEPA/US wrote: -----

To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA
From: Neil Handler/R1/USEPA/US
Date: 05/22/2009 10:27AM
Subject: Draft Boxford 308 Letter

Ive taken a stab at putting together what I believe are most of the appropriate questions we want to ask the Massachusetts Highway Department about the Boxford Salt Storage Facility as well as the Boxford Reduced Salt Area - but obviously would welcome your thoughts about any additional questions or changes that you think are appropriate. There are a couple of area in the 308 where I had some specific questions for Kathleen and David (you'll see it called out in bold). Im also attaching a copy of the map which the Mass Highway Dept prepared of the Boxford Reduced Salt Area below - I thought that this map might be the easiest document to use to request information about - but please take a look and see what you think (I'll also attach a copy of the map which Marcel and Doug prepared.

Thanks,

Neil

[attachment "Info request area map_boxford salt shed.jpg" removed by Davidj Gray/R1/USEPA/US]

[attachment "MassHwyMap_Boxford_D4-15.pdf" removed by Davidj Gray/R1/USEPA/US]

[attachment "Draft 308 Ltr5_20_09.wpd" removed by Davidj Gray/R1/USEPA/US](See attached file: Draft 308 Ltr5_20_09_djg.doc)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Doug Heath/R1/USEPA/US
To: Karen Mcguire/R1/USEPA/US@EPA, Neil Handler/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA
Date: 05/31/2009 02:13 PM
Subject: Fw: Andrews Farm Water Co.

FYI -- a proposal from the owner/operator of the Andrews Farm Water Co. regarding alternative water supplies to affected homes in Boxford...

Doug

-----Forwarded by Doug Heath/R1/USEPA/US on 05/31/2009 02:10PM -----

To: Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA
From: "Doug Conn" <drconn@comcast.net>
Date: 05/31/2009 09:56AM
cc: "Rachel Conn" <raconn@cox.net>, <Rhaeseler@jonesedmunds.com>
Subject: Andrews Farm Water Co.

Hi EPA Guys Doug & Marcel

Just a quick note and update.

I had a meeting with one (JRP) of the Titis Lane residents last week. He believes one solution to the sodium and chloride problem is to either create a new privately (Boxford won't do this) owned public water supply or purchase Andrews Farm Water Co then expand it to supply water to other contaminated Boxford residents. I told him AFWC would be available to purchase (no prices mentioned). We have excess capacity but would need a non contaminated source or install a RO filter. The source options are several. One with a 90% chance of failure if connecting to Topsfield Water. Another is drill a new well in an area that is not contaminated or just add an RO to the existing pump house. All of this would be a large financial investment. He thinks that Mass Highway would pay for all the costs.

He mentioned a new RO filter that can creates salt pellets that can be sold. I have never seen this but who knows.

That's all I know today, hope all is well

Doug. the deep blue water guy.

cc Rachel Conn , my engineer daughter

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US
To: Kathleen Woodward/R1/USEPA/US@EPA
Cc: Jeff Kopf/R1/USEPA/US@EPA, Karen McGuire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Denny Dart/R1/USEPA/US@EPA
Date: 07/01/2009 01:13 PM
Subject: Boxford Draft 308 Letter

I finally had a few moments to get back to the draft Boxford 308 Letter. Ive made some edits/changes based on the comments I received from Jeff, David and Karen - probably the most major ones are the elimination of some of the questions which the original draft had in it regarding the impacts of salt/chloride contaminated groundwater on nearby private residential wells and the steps the Mass Highway Dept has taken to remedy such situations.

At this point there isnt anything else I can think to add to the info request but I think I might have asked you - Kathleen, to hold off on your review until I made these changes.....so Kathleen could you please take a look at the request and let me know if you have any additional comments.

Once Kathleen has completed her review what would be the next step - do we think we would need to set up a briefing for Susan on this topic? Other things?

Thanks,

Neil

(See attached file: Draft 308 Ltr6_30_09.wpd)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US
To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen McGuire/R1/USEPA/US@EPA
Cc: Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA
Date: 08/12/2009 11:11 AM
Subject: Draft Boxford Salt Facility Information Request

I think I now have everyone's comments incorporated into the revised Boxford Salt Facility Information Request letter - could you please take one last look at the letter and get back to me with any comments you have by this friday. My goal, would be to send the letter out early next week unless we are aware of any changes? Doug, I know you mentioned that EPA recently had some meetings with MassHighway that you participated in - anything come out of these meetings which would effect our issuing the Info letter?

I did talk to Ross Povenmire (Boxford Director of Conservation) this morning to get an update from him....he said that MassHighway did submit an application to the Town to construct a new salt storage facility at the current location and the Town Commission issued an Order of Denial on 8/3/09 to this request. The Town expects that MassHighway will likely appeal the decision to MassDEP and that MassDEP has the authority to override the Town's decisions....so this process will likely play out further over the next year. There also was a hearing in July on the Courts decision to get MassHighway to cease the operation of the salt pile as of June 2009 - no decision yet on any change to the original decision.

thanks,

Neil

(See attached file: Draft 308 Ltr8_12_09.wpd)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US

To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA

Cc: Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Date: 08/31/2009 01:23 PM

Subject: (Another Version of the) Draft Boxford Information Request

Ok, I know I've said this before but I think (and hope) that this really is the last version/iteration of sending the Draft Boxford Information Request around for review/comment. The major change from the previous version (Draft 8/12/09 letter) is that in the latest letter (Draft 8/28/09) we have attempted to make a stronger link between the questions to the scavenger well/CWA issue.

My hope is to get the letter finalized and sent out before winter road salting operations begin again - just joking, I would like to be able to send the letter out by next week, so I'd appreciate it if you could let me know if you have any final comments by 9/9/09.

Thanks,

Neil

(See attached file: Draft 308 Ltr8_28_09.wpd)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Doug Heath/R1/USEPA/US

To: Neil Handler/R1/USEPA/US@EPA

Cc: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Date: 08/31/2009 03:50 PM

Subject: Re: (Another Version of the) Draft Boxford Information Request

Hi Neil,

Here are my comments for the 308 letter to MassHighway:

Part I, No. 4: also request the lat-long coordinates of the scavenger wells to 3 meter accuracy. This is to more easily identify such wells vs. private supply wells in the field.

With regard to ground water discharge from such wells into catch basins, the scavenger well next to Silver Brook southeast of the Exit 52 interchange has a PVC discharge pipe that discharged into an I-95 catch basin at: 42 deg. 38' 50.498"N and -70 deg. 58' 35.649"W. I have a photo of this I can give you tomorrow. Based on the 1974 I-95 design schematics you gave me, it looks like stormwater from this catch basin flows several hundred feet south underground to Fish Brook. Due to topography, Fish Brook is the primary receiving water for I-95 catch basins in this area, so you may want to ask for more details about exactly where stormwater flow from these catch basins near Exit 52 travels underground through subterranean conduits to Fish Brook.

Part II, No. 3: Add a request for information about truck and equipment washing activities at the salt storage facility. Where was this done, how many gallons of water were used per truck and how many trucks would be washed during a typical snow storm event? Also, where did the discharge wash-water go?

That's it. Please let me know when you get a response from MassHighway.

Doug

-----Neil Handler/R1/USEPA/US wrote: -----

To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA

From: Neil Handler/R1/USEPA/US

Date: 08/31/2009 01:23PM

cc: Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Subject: (Another Version of the) Draft Boxford Information Request

Ok, I know Ive said this before but I think (and hope) that this really is the last version/iteration of sending the Draft Boxford Information Request around for review/comment. The major change from the previous version (Draft 8/12/09 letter) is that in the latest letter (Draft 8/28/09) we have attempted make a stronger link between the questions to the scavenger well/CWA issue.

My hope is to get the letter finalized and sent out before winter road salting operations begin again - just joking, I would like to be able to send the letter out by next week, so I'd appreciate it if you could let me know if you have any final comments by 9/9/09.

Thanks,

Neil

(See attached file: Draft 308 Ltr8_28_09.wpd)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Doug Heath/R1/USEPA/US

To: Neil Handler/R1/USEPA/US@EPA

Cc: Davidj Gray/R1/USEPA/US@EPA, Jeff Kopf/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA

Date: 09/01/2009 09:52 AM

Subject: Re: (Another Version of the) Draft Boxford Information Request

Neil,
Attached below are jpeg files for three photos taken last spring in Boxford. The first two are of the scavenger well discharge line on the east side of I-95 taken on 5/28/09 and the third is of the Fish Brook bridge south of Exit 52 taken on 6/5/09. Hope this helps you.
Doug

(See attached file: I95Nscavengerwelldischargecatchbasin052809.jpg)(See attached file:

I95scavengerwelldischargelineboxfordma052809.jpg)(See attached file:

I95fishbrooklookingupstreamboxfordma060509.jpg)

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Davidj Gray/R1/USEPA/US

To: Ted Lavery/R1/USEPA/US@EPA

Cc: Marcel Belaval/R1/USEPA/US@EPA

Date: 09/01/2009 02:58 PM

Subject: Re: Fw: MA highway

Hi Ted - Sure, I can meet to discuss MassHighway and should be available most Tuesdays, Wednesdays, or Fridays. I have attached MassHighway's responses to our letters dated 8/18/06 and 10/10/06, its most recent SWMP (Rev.4, Jan. 11, 2008; in two parts due to size), and a memo I drafted to the file this past winter that summarized my thoughts on its responses related to snow and ice control (items highlighted in yellow indicate those which MassHighway was not responsive).

n.b. We do not generally comment on annual reports. Our letters of 8/18/06 and 10/10/06 represent our last substantive correspondence; meant to shape MassHighway's SWMP into a more acceptable program.

Thanks,

~~~~~  
David J. Gray, P.E.  
Office of Ecosystem Protection  
U.S. Environmental Protection Agency  
1 Congress Street, Suite 1100 (CIP)  
Boston, MA 02114-2023

Phone: 617.918.1577  
eFax: 617.918.0577  
gray.davidj@epa.gov  
▼ Ted Lavery/R1/USEPA/US

**Ted Lavery/R1/USEPA/US**

08/31/2009 01:33 PM

To Davidj Gray/R1/USEPA/US@EPA  
cc Marcel Belaval/R1/USEPA/US@EPA  
Subject Fw: MA highway

David -  
Marcel Belaval and myself were interested in meeting with you sometime at the end of September to discuss some of the Masshighway Stormwater efforts. Specifically, we are interested in MA Highway's response to the last letter from your office on their annual report.

If you have a copy of MassHighways response, could you please forward it for us to take a look at? We are interested in how Masshighway's efforts on chloride issues might impact drinking water protection issues. Thanks

- Ted

=====

File MHD 1-11-08 SWMP Response Matrix.pdf was moved to Z:\MHD 1-11-08 SWMP Response Matrix\_1.pdf on 11/14/2012

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File MHD MS4 2\_09 Update.doc was moved to Z:\MHD MS4 2\_09 Update.doc on 11/14/2012

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File MassHighway SWMP rev04 1\_11\_08 (1of2).pdf was moved to Z:\MassHighway SWMP rev04 1\_11\_08 (1of2)\_1.pdf on 11/14/2012

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File MassHighway SWMP rev04 1\_11\_08 (2of2).pdf was moved to Z:\MassHighway SWMP rev04 1\_11\_08 (2of2)\_1.pdf on 11/14/2012

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US  
To: Jeff Kopf/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA  
Cc: Carl Deloi/R1/USEPA/US@EPA, Timothy Timmermann/R1/USEPA/US@EPA, Stephen Silva/R1/USEPA/US@EPA, Matt Schweisberg/R1/USEPA/US@EPA, Jane Downing/R1/USEPA/US@EPA, Denny Dart/R1/USEPA/US@EPA, Mike Fedak/R1/USEPA/US@EPA  
Date: 09/22/2009 01:16 PM  
Subject: Mass Highway Dept. 308 Request re: Boxford

---



Just wanted to let you know that the CWA information request to the Massachusetts Highway Department regarding the Boxford Salt Storage Facility (Boxford, MA) was mailed out today. I've attached a copy of the letter to this email - please let me know if you have any questions. I will also send a courtesy copy to David Terry at the MassDEP Drinking Water program. Thanks for your help!

*(See attached file: MassHwyInfoRequest9\_22\_09.pdf)*

Neil Handler  
Senior Enforcement Coordinator  
EPA Region 1, Water Technical Unit  
1 Congress Street, Suite 1100 (SEW)  
Boston, MA 02114  
Tel (617) 918-1334  
Fax (617) 918-0334

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Neil Handler/R1/USEPA/US  
To: Karen Mcguire/R1/USEPA/US@EPA, Kathleen Woodward/R1/USEPA/US@EPA, Doug Heath/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA  
Cc: Jeff Kopf/R1/USEPA/US@EPA  
Date: 10/05/2009 09:03 AM  
Subject: Fw: boxford extension

---

Just wanted to let you know that we recently received a 30-day extension request from MA Highway for responding to the 308 information request we issued to them regarding the Boxford Salt Storage Facility and the nearby Interstate 95 Highway exchange. We agreed to the extension request and MA Highway now has to November 23, 2009 to respond.

----- Forwarded by Neil Handler/R1/USEPA/US on 10/05/2009 08:56 AM -----

**Jeff Kopf/R1/USEPA/US**

10/05/2009 08:52 AM

To: Neil Handler/R1/USEPA/US@EPA  
  
cc  
  
Subject: boxford extension

Here's the extension electronically.

*(See attached file: Ma Highway 308 Extension (Oct 2 09).pdf)*

Jeff Kopf, Senior Enforcement Counsel  
US EPA Region 1  
1 Congress St.  
Suite 1100 (SEL)  
Boston, MA 02114-2023  
Tel: (617) 918-1796  
Fax: (617) 918-0796  
kopf.jeff@epa.gov

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Davidj Gray/R1/USEPA/US  
To: Marcel Belaval/R1/USEPA/US@EPA  
Cc: Jeff Butensky/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA  
Date: 03/23/2010 10:30 AM  
Subject: Re: masshighway ms4 permit

---

Sounds good - see you all there at 1:30pm.

▼ Marcel Belaval---03/23/2010 08:54:41 AM---That works for me.

From: Marcel Belaval/R1/USEPA/US  
To: Karen Mcguire/R1/USEPA/US@EPA  
Cc: Davidj Gray/R1/USEPA/US@EPA, Jeff Butensky/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA  
Date: 03/23/2010 08:54 AM  
Subject: Re: masshighway ms4 permit

---

That works for me.

▼ Karen Mcguire---03/23/2010 08:49:29 AM---This afternoon works for me, too. What about 1:30? I reserved the Crocker Mountain conference room

From: Karen Mcguire/R1/USEPA/US  
To: Marcel Belaval/R1/USEPA/US@EPA  
Cc: Davidj Gray/R1/USEPA/US@EPA, Jeff Butensky/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA  
Date: 03/23/2010 08:49 AM  
Subject: Re: masshighway ms4 permit

---

This afternoon works for me, too. What about 1:30? I reserved the Crocker Mountain conference room (0103) on the 1st floor, as the table in my office is pretty small in the event we want to take a look at any documents .... Let me know if this works for you.

Karen

▼ Marcel Belaval---03/23/2010 08:27:33 AM---Hi Jeff, My schedule has changed this week and I'm available today or Friday. I'll be out in the fi

From: Marcel Belaval/R1/USEPA/US  
To: Davidj Gray/R1/USEPA/US@EPA  
Cc: Jeff Butensky/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA  
Date: 03/23/2010 08:27 AM

Subject: Re: masshighway ms4 permit

---

Hi Jeff,

My schedule has changed this week and I'm available today or Friday. I'll be out in the field Thurs instead of today.

thanks,  
Marcel

▼ Davidj Gray---03/23/2010 08:06:40 AM---Hi Karen, Yes - I think it would be good to meet. I'm available this afternoon (as one of the dates

From: Davidj Gray/R1/USEPA/US  
To: Karen Mcguire/R1/USEPA/US@EPA  
Cc: Jeff Butensky/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA  
Date: 03/23/2010 08:06 AM  
Subject: Re: masshighway ms4 permit

---

Hi Karen,

Yes - I think it would be good to meet. I'm available this afternoon (as one of the dates originally suggested by Jeff), Wednesday morning, or anytime on Friday. I have attached our related deficiency letters from August and October 2006, and appended an email to Ted from last fall that includes some subsequent relevant documents. Also, MassDOT's MS4 annual reports and related MS4 permit documentation are available on their web page at url: <http://www.mhd.state.ma.us/default.asp?pgid=content/environ/envNPDES&sid=about>

Thanks,  
djg

[attachment "MHD GEIR-SWMP Rev Ltr.pdf" deleted by Marcel Belaval/R1/USEPA/US] [attachment "MHD SWMP Def Ltr 8\_30\_06.pdf" deleted by Marcel Belaval/R1/USEPA/US]

**Re: Fw: MA highway** 

**Davidj  
Gray**

to: Ted Lavery

09/01/2009 02:58 PM

Cc: Marcel Belaval

Hi Ted - Sure, I can meet to discuss MassHighway and should be available most Tuesdays, Wednesdays, or Fridays. I have attached MassHighway's responses to our letters dated 8/18/06 and 10/10/06, its most recent SWMP (Rev.4, Jan. 11, 2008; in two parts due to size), and a memo I drafted to the file this past winter that summarized my thoughts on its

responses related to snow and ice control (items highlighted in yellow indicate those which MassHighway was not responsive).

n.b. We do not generally comment on annual reports. Our letters of 8/18/06 and 10/10/06 represent our last substantive correspondence; meant to shape MassHighway's SWMP into a more acceptable program.

[attachment "MHD 1-11-08 SWMP Response Matrix.pdf" deleted by Marcel Belaval/R1/USEPA/US] [attachment "MHD MS4 2\_09 Update.doc" deleted by Marcel Belaval/R1/USEPA/US] [attachment "MassHighway SWMP rev04 1\_11\_08 (1of2).pdf" deleted by Marcel Belaval/R1/USEPA/US] [attachment "MassHighway SWMP rev04 1\_11\_08 (2of2).pdf" deleted by Marcel Belaval/R1/USEPA/US]

Thanks,

~~~~~  
David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100 (CIP)
Boston, MA 02114-2023

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

▼ Karen Mcguire---03/22/2010 10:23:19 AM---Marcel and Dave, At a recent internal source water meeting, Jeff offered to review and summarize the

From: Karen Mcguire/R1/USEPA/US
To: Marcel Belaval/R1/USEPA/US@EPA, Davidj Gray/R1/USEPA/US@EPA
Cc: Ted Lavery/R1/USEPA/US@EPA, Jeff Butensky/R1/USEPA/US@EPA
Date: 03/22/2010 10:23 AM
Subject: masshighway ms4 permit

Marcel and Dave,

At a recent internal source water meeting, Jeff offered to review and summarize the various submissions received on anti-icing and drinking water protection efforts under the MS4 permit. Does it make sense for us to meet so you can give Jeff an overview of what we have, get him relevant docs, etc.? Let me know your thoughts.

Thanks.

Karen

----- Forwarded by Davidj Gray/R1/USEPA/US on 02/07/2013 11:17 AM -----

From: Davidj Gray/R1/USEPA/US
To: Marcel Belaval/R1/USEPA/US@EPA
Cc: Jeff Butensky/R1/USEPA/US@EPA, Karen Mcguire/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA
Date: 05/06/2010 09:44 AM
Subject: Re: masshighway meeting

If available in electronic format, can someone send me a copy of MassDOT's response to our September '09 response letter?

Thanks,
djg

▼ Marcel Belaval---04/29/2010 03:10:03 PM---Good for me.

From: Marcel Belaval/R1/USEPA/US
To: Karen Mcguire/R1/USEPA/US@EPA
Cc: Davidj Gray/R1/USEPA/US@EPA, Jeff Butensky/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA
Date: 04/29/2010 03:10 PM
Subject: Re: masshighway meeting

Good for me.

▼ Karen Mcguire---04/29/2010 03:03:23 PM---All -- I would like to meet at 10 next Thursday if that's still good for everyone. Let me know. I'

From: Karen Mcguire/R1/USEPA/US
To: Davidj Gray/R1/USEPA/US@EPA, Jeff Butensky/R1/USEPA/US@EPA, Marcel Belaval/R1/USEPA/US@EPA, Ted Lavery/R1/USEPA/US@EPA
Date: 04/29/2010 03:03 PM
Subject: masshighway meeting

All --

I would like to meet at 10 next Thursday if that's still good for everyone. Let me know. I'll look for a conference room.

Karen